



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RSB
F. #2024R00506/2023R00300

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 12, 2024

BY HAND DELIVERY AND ECF

The Honorable Carol B. Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

The Honorable Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Tony Terry
Criminal Docket No. 24-CR-244 (CBA)(PK)

United States v. Justinna Boatwright
Criminal Docket No. 23-CR-488 (DLI)(JRC)

Dear Judge Amon and Judge Irizarry:

Pursuant to Local Rule 50.3.2, the government hereby notifies the Court that the above-captioned case ("Terry") is presumptively related to United States v. Justinna Boatwright, No. 23-CR-488 (DLI)(JRC)USA ("Boatwright").

Local Rule 50.3.2(b)(1) provides for a "presumption that one case is 'related' to another when the facts of each arise out of the same charged criminal scheme(s), transaction(s), or event(s), even if different defendants are involved in each case." Local Rule 50.3.2(c)(1) directs the United States Attorney's Office to "give notice to all relevant judges whenever it appears that one case may be presumptively related to another pursuant to Section (b)(1)."

This letter constitutes the notice directed by Local Rule 50.3.2(c)(1). This case is presumptively related to Boatwright because the facts of Terry's case arise out of the same criminal scheme and events, as charged in Boatwright. Specifically, a grand jury returned an

indictment charging Boatwright with firearms trafficking conspiracy and related charges from November 2022 through December 2022, including overt acts pertaining to her December 6th, 2022 gun sales to an undercover officer of a Taurus 9mm G2c and a Smith and Wesson 380 caliber M&P Bodyguard. A grand jury further returned an indictment charging Terry with firearms trafficking conspiracy and related charges from November 2022 through March 2023, including overt acts pertaining to his co-conspirator's', i.e., Boatwright's, December 6th, 2022 gun sales to an undercover officer of a Taurus 9mm G2c and a Smith and Wesson 380 caliber M&P Bodyguard. As the case is thus presumptively related, the government respectfully submits that reassignment would be appropriate, as it would likely result in a significant savings of judicial resources and serve the interests of justice.

Respectfully submitted,

BREON PEACE
United States Attorney

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